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**From:** Minter, Douglas [Minter.Douglas@epa.gov]  
**Sent:** 9/25/2019 9:01:25 PM  
**To:** Bahrman, Sarah [Bahrman.Sarah@epa.gov]  
**Subject:** FW: \*Quick Turnaround Requested\*- Bowling Chart Targets Needed (Tomorrow COB)

Clarification: current backlog for existing permits is two but expect it to rise to three in November since KM Class I permit expires on 10/31/19.

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**From:** Minter, Douglas  
**Sent:** Wednesday, September 25, 2019 2:28 PM  
**To:** Bahrman, Sarah <Bahrman.Sarah@epa.gov>  
**Subject:** RE: \*Quick Turnaround Requested\*- Bowling Chart Targets Needed (Tomorrow COB)

Thanks. I hope to get confirmation from OGWDW today on whether we can adjust these targets later. If we can, I am fine with putting 9/30/20 for the final DB permits. If we cannot adjust targets, I may put a footnote for today saying that we will need further management input, etc. I will follow up on your prompts to inform a new project management schedule based on what we can project for now.

For existing permits, our current backlog appears to be three. Specifically, we have one Class V well application submitted just before the permit expired in July (note: we also have four other Class V wells for which permits have expired and will be tracked as new permits when the applications are received). We expect to issue the final permit for this application by January. KM is a bit unique since we didn't know which of their three applications received in February would need a Class I permit until 5/10/19 when the company disclosed which two they wanted permitted as Class II by the COGCC. The other Class I permit application backlogged is from OXY. We expect final Class I final permits for both to be issued in December. We will continue to plan ahead by encouraging timely application for renewing other permits that will be expiring next year. This includes East Cherry Creek Valley (app received 4/15/19 with permit expiring 4/25/20) and Sterling (application pending with permit expiring 10/1/20) which both use Class I wells to dispose of DW treatment wastes.

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**From:** Bahrman, Sarah <Bahrman.Sarah@epa.gov>  
**Sent:** Wednesday, September 25, 2019 1:35 PM  
**To:** Minter, Douglas <Minter.Douglas@epa.gov>  
**Subject:** RE: \*Quick Turnaround Requested\*- Bowling Chart Targets Needed (Tomorrow COB)

Hi Douglas – I think that sounds fine for Mann Oil. Have you heard anything else on the status of their FA?

For Dewey, we'll need to have some longer discussions with Darcy about the amount of time needed to issue final permits since she obviously has her own expectations based on our last discussion with her. I think it's fine to put the 9/30/20 date for backlog, but let's not assume that is our working deadline for the final permits until we have talked that through in more detail with Darcy.

I don't know how to estimate the schedule for final permit issuance until after we have reviewed public comments. I am curious what time the team thinks they will need just on the RTC alone. Can you ask about that? We should also consider Chuck's retirement, although hopefully he is able to help with this until he leaves. If we assume no changes to the permits based on public comments (other than FR, which we already know about), when does Valois think we can reasonably issue final permits? NHPA should be a part of that as well.

For existing permits, what is that total universe? And do you expect any others will be backlogged in 2020 (other than possibly Kinder Morgan)?

Thanks  
Sarah

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**From:** Minter, Douglas <[Minter.Douglas@epa.gov](mailto:Minter.Douglas@epa.gov)>  
**Sent:** Wednesday, September 25, 2019 12:17 PM  
**To:** Bahrman, Sarah <[Bahrman.Sarah@epa.gov](mailto:Bahrman.Sarah@epa.gov)>  
**Subject:** FW: \*Quick Turnaround Requested\*- Bowling Chart Targets Needed (Tomorrow COB)

Hi Sarah: here is my thinking to inform targets for New Permits: the total of 7 for this month (see table below) reflects the three FBIR applications received in March, 2019. We have requested exceptions for these since BIA does not expect to authorize surface access. This number also includes the four other backlogged applications including Mann Oil. This could change to 6 by 12/31/19 if we move forward with issuing draft and final permits for Mann by 12/31/19 (currently noted in our countermeasures table). Even more uncertain would be the timing of final Class III and V permits for DB since all comments won't be in until 12/9/19. If we do commit to issuing these permits in FY 2020, I would recommend we do so by 9/30/20 (assuming all our tribal consultations are complete by then).

For Existing Permits, its apparent that regardless of when an application is received, applications become backlogged on the expiration date unless the permit has been re-issued by this date. However, if the permit expires, then a subsequent application is tracked as a new permit essentially giving us 180 days to act before it becomes backlogged. We are scrubbing our universe of Class I and V permits to confirm which ones expire during FY 2020 to inform our targets. Its likely some of these will become backlogged in FY 2020 (e.g., one of three Kinder Morgan applications for which a Class I permit may not be re-issued by the 10/31/19 expiration date).

Please let me know your thoughts by COB today if possible,

Douglas

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**From:** Dyroff, Colin <[dyroff.colin@epa.gov](mailto:dyroff.colin@epa.gov)>  
**Sent:** Tuesday, September 24, 2019 2:42 PM  
**To:** Jann, Stephen <[jann.stephen@epa.gov](mailto:jann.stephen@epa.gov)>; Tingey, Christopher <[tingey.christopher@epa.gov](mailto:tingey.christopher@epa.gov)>; Bennett, James <[bennett.james@epa.gov](mailto:bennett.james@epa.gov)>; Burgess, Karen <[Burgess.Karen@epa.gov](mailto:Burgess.Karen@epa.gov)>; Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Minter, Douglas <[Minter.Douglas@epa.gov](mailto:Minter.Douglas@epa.gov)>; Mindrup, Mary <[Mindrup.Mary@epa.gov](mailto:Mindrup.Mary@epa.gov)>; Dellinger, Philip <[dellinger.philip@epa.gov](mailto:dellinger.philip@epa.gov)>; Smith, Brian <[Smith.Brian@epa.gov](mailto:Smith.Brian@epa.gov)>; Conley, Alanna <[conley.alanna@epa.gov](mailto:conley.alanna@epa.gov)>; Ash, Christine <[Ash.Christine@epa.gov](mailto:Ash.Christine@epa.gov)>; Springborg, Denise <[Springborg.Denise@epa.gov](mailto:Springborg.Denise@epa.gov)>; Downing, Jane <[Downing.Jane@epa.gov](mailto:Downing.Jane@epa.gov)>; Osborne, Evan <[Osborne.Evan@epa.gov](mailto:Osborne.Evan@epa.gov)>; Cheung, Wendy <[Cheung.Wendy@epa.gov](mailto:Cheung.Wendy@epa.gov)>; Hildebrandt, Kurt <[Hildebrandt.Kurt@epa.gov](mailto:Hildebrandt.Kurt@epa.gov)>; Meissner, Benjamin <[Meissner.Benjamin@epa.gov](mailto:Meissner.Benjamin@epa.gov)>; Perenchio, Lisa <[perenchio.lisa@epa.gov](mailto:perenchio.lisa@epa.gov)>; Meadows, JasonB <[Meadows.JasonB@epa.gov](mailto:Meadows.JasonB@epa.gov)>; Rowsey, Kevin <[rowsey.kevin@epa.gov](mailto:rowsey.kevin@epa.gov)>; Rectenwald, David <[Rectenwald.Dave@epa.gov](mailto:Rectenwald.Dave@epa.gov)>; Rapicavoli, Emmanuelle <[Rapicavoli.Emmanuelle@epa.gov](mailto:Rapicavoli.Emmanuelle@epa.gov)>; Rafi, Khurram <[rafi.khurram@epa.gov](mailto:rafi.khurram@epa.gov)>; Roberto, Joseph <[Roberto.Joseph@epa.gov](mailto:Roberto.Joseph@epa.gov)>; Hawley, Alison <[Hawley.Alison@epa.gov](mailto:Hawley.Alison@epa.gov)>; Kobelski, Bruce <[Kobelski.Bruce@epa.gov](mailto:Kobelski.Bruce@epa.gov)>  
**Cc:** Bates, William <[bates.william@epa.gov](mailto:bates.william@epa.gov)>  
**Subject:** \*Quick Turnaround Requested\*- Bowling Chart Targets Needed (Tomorrow COB)

All,

We are being asked for monthly regional targets for the new and existing permit backlog, to be used for bowling chart purposes. They are asking for them in advance of a meeting on Thursday, so would everybody be able to respond by **Wednesday (tomorrow) COB?**

Essentially, they want regional targets for each month through September 2020 that put us on track to achieve the September 2021 APG. This means they want us to be 50% of the way to the APG by September 2020.

**So, can each region fill their targets in the below tables and return to me?** I've filled in the necessary starting points and ending points, but I need you all to help fill in the rest. Try to base the targets in reality, but at the end of the day, we may need to put something that isn't feasible. Such is the nature of these exercises.....

Also, the numbers should be the total of both excepted and non-excepted permit applications. Exceptions will be taken into account after the target setting.

New Permits (backlogged 180 days after submittal)- 50% reduction required for 9/30/20 target

Region	8/31/19	9/30/19	10/31/19	11/30/19	12/31/19	1/31/20	2/29/20	3/31/20	4/30/20	5/31/20	6/30/20
3	0										
4	1										
5	11										
6	5										
7	0										
8	4	7	7	7	6	6	6	6	6	6	6
9	6										
10	1										

7/31/20	8/31/20	9/30/20
		0
		0
		6
		3
		0
6	6	4 or 6*?
		3
		0

Existing Permit Backlog (backlogged the day of expiration)- 25% reduction required for 9/30/20 target

Region	8/31/19	9/30/19	10/31/19	11/30/19	12/31/19	1/31/20	2/29/20	3/31/20	4/30/20	5/31/20	6/30/20
3	1										
4	2										
5	9										
6	0										
7	0										
8	2										
9	8										
10	0										

7/31/20	8/31/20	9/30/20
		1
		1
		7
		0
		0
		2
		6
		0

Note I did some rounding on the 9/30/20 targets. There is a small amount of leeway here- please contact me if you want to discuss.

Thanks,

Colin Dyroff  
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